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August 26, 2021

Honorable Robert W. Lehrburger

United States Magistrate Judge

Daniel Patrick Moynihan

**United States Courthouse** 

500 Pearl St.

New York, NY 10007

**Letter Motion:** 

**Extension of Time Request** 

Re: Anthony Ayala v. Comm'r of SSA 1:20-cv-09373-JGK

Dear Honorable Judge Lehrburger:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on August 29, 2021. Due to the many administrative transcripts filed by the Defendant as he recovers from the pandemic backlog, Plaintiff's counsel has incurred several conflicts on the motion calendar and requires additional time to prepare his brief in this matter.

Plaintiff therefore writes to respectfully request an extension of time of sixty days (60) to serve her motion through and including October 28, 2021, with the remaining Order to remain in effect. No previous request for an extension has been made in this case and the Defendant has given consent.

Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

Attorney for Plaintiff

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Cc: Heetano Shamsoondar, Esq. (Via ECF)
Special Assistant United States Attorney
Attorney for Defendant

Application granted. SO ORDERED.

August 27, 2021 /s/ John G. Koeltl

New York, NY John G. Koeltl, U.S.D.J.